

REMARKS

Claims 7, 9 and 21-41 are pending in the application. Claims 7 and 9 have been amended, and claims 1-6, 8 and 10-20 have been cancelled. Claims 21-41 are newly added. Reconsideration of the rejection and allowance of the pending application in view of the following remarks are respectfully requested.

As an initial matter, Applicants would like to thank the Examiner for allowing claim 7, and for indicating that claim 9 contains allowable subject matter.

Applicants also thank the Examiner for accepting the drawings filed on December 4, 2003, acknowledging Applicants' claim for foreign priority and receipt of all of the certified copies of the priority documents, and for considering all of the documents cited in the Information Disclosure Statements filed on March 18, 2004, June 25, 2004, and November 3, 2004.

In the Office Action, the Examiner objected to the Abstract of the disclosure, asserting that the Abstract uses terminologies that should be avoided (such as "means" and "comprising"). Applicants have amended the Abstract to remove such terminologies, and respectfully request the Examiner to withdraw the objection to the Abstract.

The Examiner also objected to the title, asserting that it is not descriptive. Applicants have amended the title to "Image Forming Apparatus Having a Cooler for an Organic Electroluminescence Element". Applicants respectfully submit that the amended title is descriptive, and respectfully request the Examiner to withdraw the objection.

In the Office Action, the Examiner objected to claims 7 and 10 because of

informalities. Applicants have amended claim 7, and respectfully submit that the amendment overcomes the Examiner's objection. Applicants have also cancelled claim 10, thus rendering the objection moot.

In the Office Action, the Examiner rejected claims 1-4, 6, 8, 10, 11 and 14-19 under 35 U.S.C. § 103(a) as being unpatentable over Koumura et al. (U.S. Patent No. 6,266,074) in view of Yokoyama et al. (U.S. Patent No. 6,607,277), rejected claims 5 and 20 under 35 U.S.C. § 103(a) as being unpatentable over Koumura et al. in view of Yokoyama et al. and DeCock et al. (U.S. Patent No. 5,751,327), and rejected claims 12 and 13 under 35 U.S.C. § 103(a) as being unpatentable over Koumura et al. in view of Yokoyama et al. and Maekawara et al. (U.S. Patent No. 6,121,993).

Applicants have cancelled claims 1-6, 8 and 10-21 merely to advance prosecution of the present application. Thus, the cancellation of these claims should not be viewed as an acquiescence to the propriety of the rejections.

In the Office Action, the Examiner objected to claim 9 as being dependent upon a rejected base claim, but indicated that claim 9 would be allowable if rewritten in independent form including all of the limitations of base claim 8. Applicants have amended claim 9 to be in independent form, including substantially all of the features of claim 8 (now cancelled). The amendments of claims 7 and 9 have been made to improve the language and to clarify the claims without substantially changing their scope. Thus, Applicants respectfully request that the Examiner withdraw the objection to claim 9, and allow the claim.

Applicants have added new claims 21-41, of which claims 21, 27, 32 and 37 are independent. Claim 21 recites an image forming apparatus which includes a

photosensitive member, a charger, an exposer, a developer, a transferor, a fixer and a cooler configured to cool an organic electroluminescence element of the exposer to a predetermined temperature equal to or lower than a crystallizing temperature of an organic substance of the organic electroluminescence element.

Claim 27 recites an image forming apparatus which includes a photosensitive member, a charger, an exposer, a developer, a transferor, a fixer, a cooler, and a controller configured to control the cooler to cool an organic electroluminescence element of the exposer to a predetermined temperature equal to or lower than a crystallizing temperature of an organic substance of the organic electroluminescence element.

Claim 32 recites an image forming apparatus which includes a photosensitive member, a charger, an exposer, a developer, a transferor, a fixer, and a temperature maintainer configured to maintain a temperature of an organic electroluminescence element of the exposer to a predetermined temperature equal to or lower than a crystallizing temperature of an organic substance of the organic electroluminescence element.

Claim 37 recites an image forming apparatus which includes a photosensitive member, a charger, an exposer, a developer, a transferor, a fixer, and a cooler configured to reduce heat applied by the fixer to the organic electroluminescence element.

Applicants respectfully submit that the applied prior art does not disclose or suggest the above-noted claimed combinations of features.

Koumura discloses an image forming apparatus. As the Examiner acknowledges

in the Office Action, Koumura does not disclose a cooler configured to cool an organic electroluminescence element of an exposer.

Yokoyama discloses a projection display apparatus. As the Examiner acknowledges in the Office Action, Yokoyama fails to disclose a cooler that cools an organic electroluminescence element of an exposer to a predetermined temperature equal to or lower than a crystallizing temperature of an organic substance of the organic electroluminescence element. Applicants respectfully submit that Yokoyama also fails to disclose a temperature maintainer configured to maintain a temperature of an organic electroluminescence element of an exposer to a predetermined temperature equal to or lower than a crystallizing temperature of an organic substance of the organic electroluminescence element. Furthermore, as Yokoyama is not directed towards an image forming apparatus, Applicant submit that Yokoyama fails to disclose a photosensitive member, a charger, an exposer, a developer, a transferor, a fixer, and a cooler configured to reduce heat applied by the fixer to an organic electroluminescence element of an exposer.

Maekawara and DeCock disclose image forming apparatuses. However, Applicants submit that Maekawara and DeCock do not disclose an exposer which includes an organic electroluminescence element and irradiates a photosensitive member with light to form an electrostatic latent image. Rather, Applicants submit that Maekawara and DeCock's image forming apparatuses use a linear array of LEDs as recording heads.

For at least these reasons, Applicants submit that newly added claims 21-41 are allowable, and respectfully request the Examiner to allow these claims.

Based on the above, it is respectfully submitted that this application is now in condition for allowance, and a Notice of Allowance is respectfully requested.

In response to the Examiner's Statement of Reasons for Allowance of claims 7 and 9, Applicants wish to clarify the record with respect to the basis for the patentability of the claims. While Applicants do not disagree with the Examiner's indication that certain identified features are not disclosed by the references, Applicants submit that each of the claims recite a particular combination of features, and that the basis for patentability of each of these claims is based on the totality of the particular features recited therein.

SUMMARY AND CONCLUSION

Entry and consideration of the present amendment, reconsideration of the outstanding Office Action, and allowance of the present application and all of the claims therein are respectfully requested and now believed to be appropriate. Applicants have made a sincere effort to place the present invention in condition for allowance and believe that they have now done so.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
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